

THE UNITED STATES DISTRICT COURT
IN THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM BRANCH : CIVIL No. CV-00-1728
Plaintiff :
Vs. : (Judge CONNER)
Mr. RUSSIAN et. al., :
Defendants :

BRIEF IN SUPPORT OF MOTION FOR INJUNCTIVE RELIEF

If it please this august court Here come Wm Branch
CF3756 inmate at Sci. Waymart asking this court for a Temporary
OR a Permanent injunction; forbidding the D.O.C from cutting my
Hair (Based upon my Religious Beliefs as stated in the Holy Bible
at numbers 6:1-21, 2, 5. [Reading from the Oxford Niv. Scofield
Study bible also Footnotes #6:1] the key word being wants appearing
in verse 2 if a man or a woman wants to make a special vow, a
vow of separation to the Lord as a Nazirite See Footnote 6:1])
also this Request comes after I wrote up C/O Gowat and MR Friedman
for Denying me a shower before I go to church on the Sabbath at
8:30^{AM} when the PRISON Policy was that shower start at 8:00 AM
For 3 Saturdays I was denied showers. C/O Gowat, Capt Griffith, Capt
Gavin, and MR Friedman knew this policy was in effect since December 16,
2003 yet they Refused to allow me to shower and did not state that
8:00 AM was the correct time to shower: Grievance # 74377 + # 74742
C/O Gowat along with all defendants name Retaliated against me
By demanding I cut my hair, this is a conspiracy and the "Causal
link" is the "Suggestive Temporal Proximity" because I Reported
C/O Gowat and he stated to another inmate that he would fix me
[inmate AKA Columbia] 2/9/04 #5, and this coming on the heel of my
Reporting is misconduct, along w/ the fact that I showed them DOC
Policy # 819 Pg. 8 (2)(b) Religious activity Policy they still insisted
I should follow the last order given.

There is No Security issue with Regard to my hair it is pulled Back
and my Beard is Tied under my chin as Cited: in Benjamin K.
Coughlin 905 F.2d 571 US cert denied 112 Lc 335 (1990) There appears to
Be an alternative means whereby the Religious Right will not Be
under minded. Today 2-9-04 The P.O.C. forced me to get a hair
cut or face a write up. To show the D.O.C. and the court

Pg. 2 That I ~~do~~ follow the Rules and the C/o directions, and I look to this noble Tribune for Relief

Questions Presented to the Court

1. Can the D.O.C. force me to cut my Hair while the court is still Reviewing my complaint
2. Can the D.O.C. deny me a shower before church on my Sabbath in violation of its own stated Policy and No other Restriction on showers were in place i.e. Broken pipe OR water Restriction.
3. Can the D.O.C. Retaliate against me of exercising my const. Rights. Title 42 USCA 2000 cc 5.(7)(A)

answer

1. No
2. No
3. No

The Doc is engaging in a form of Iconoclastice Behavior when it is duty bound to uphold the FIRST amendment, Not seek out ways to violate the freedom of Religion Rights. For three ~~year~~ years I was allowed to exercise my Belief, sense the court has set a date for TRIAL, I have been transferred back to MR Friedman unit and been attacked by these named Defendants in a effort to Retaliate and Punish me and to write Disciplinary misconduct in order to put me in the RHU so they can Read my legal material and the premis they put forth is: if he is sincere he will not allow us to cut his hair. (from ~~the~~ christians this should not be) Romans 14:4, 1-3 To his master he stands or falls -(13:1-3) I was Given an order I am in court for the same matter. I have Tried to Practice my Belief for the last 5 years and the D.O.C. has ordered me to cut my Hair.

My Sincerity has been atested to these past 5 years the names I have Been called the mistreatment I have Relieved By staff and inmates No one/man Told me to take this upon myself. this is a Revelation from GoD. I Received no special ~~props~~ props, I can't get New cloths OR shoes OR a Belt. Same shoes 5yrs some clothes 4yrs I ask for New clothes for church with a hem, "Nothing" Just one! GoD sees and he knows the truth I am Trusting him to show you the Truth of my Plight.

For these Reasons I ask this august COURT to order The D.O.C. To stop it's Retaliation and it's forceing me to cut my Hair.

Pg. 3 and Remove MRFriedman from this Prison
and C/o Gowan as well, also I want Damages of 200,000.⁰⁰
Because they Knew I had put in a Religious Exemption DG-52
on Friday 2-6-04 and I showed them Doc Policy 819 Pg. 8
(b.) This was the only Hair accomadation I have put in
Sense the Doc. changed its policy, MR Friedman tried
To play dum and say I already had 15 days and the
Exemption was denied!

I Pray this noble court will grant my Request for an
Injunction

Respectfully

Proof of Service
I affirm that I have mailed the named parties this motion
MS Mosley esq. By first class mail.
Strawberry Sq 15 FL
Harrisburg Pa 17120

J Conners
PO Box 983
Harrisburg Pa 17108

Unsworn Declaration
I affirm under Penalty of the Law that the above is true

Date 4-9-04

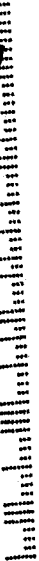
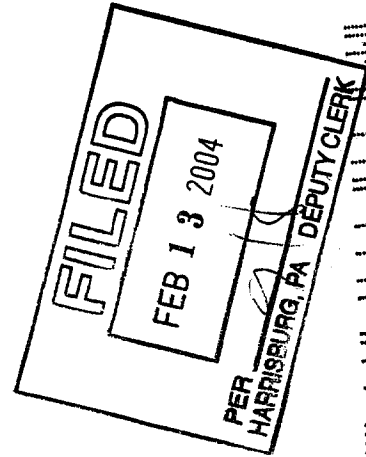
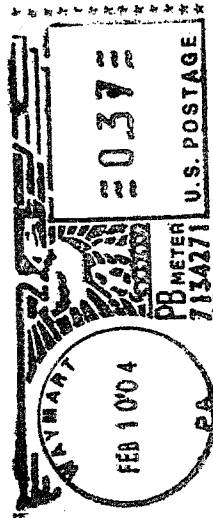
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